

Federal Defenders

OF NEW YORK, INC.

Southern District

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*David E. Patton
Executive Director
and Attorney-in-Chief*

JAN 14 2020

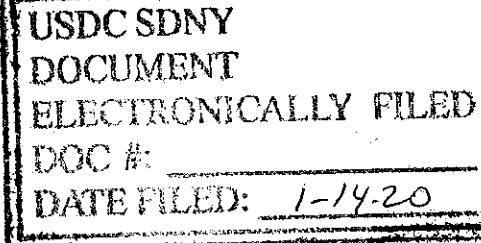
JUDGE KEENAN'S CHAMBERS

Southern District of New York
Jennifer L. Brown
Attorney-in-Charge

January 14, 2020

By ECF/Hand

Honorable John F. Keenan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Christopher Torres, 19 Cr. 865 (JFK)

Hon. Judge Keenan:

MEMO ENDORSED

With the consent of the government, I write to respectfully request a 60-day adjournment of the January 22, 2020 status conference. An adjournment would permit the defense's continuing review of discovery and allow the parties the opportunity to engage in plea negotiations. This letter constitutes the first request for an adjournment by either party.

To that end, we request that the time between January 22, 2020 and the next court date be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161(h)(7)(A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, because it will allow the government and defense counsel to continue discussions regarding a possible disposition in the matter. Thank you.

*Application Granted
The case is adjourned to
February 24, 2020 TIME EXCLUDED
11AM. *John F. Keenan*
As ordered *ASD*
January 14, 2020*

Respectfully submitted,

/s/ Ariel Werner

Ariel Werner
Assistant Federal Defender
212-417-8770

CC: AUSA Rushmi Bhaskaran